

CHAITMAN LLP

465 Park Avenue
New York, New York 10022
Phone & Fax: (888) 759-1114
Helen Davis Chaitman
hchaitman@chaitmanllp.com

Attorneys for Defendants

**UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION
(Substantively Consolidated)

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

LISA BETH NISSENBAUM TRUST; and NEAL
KURN, in his capacity as Trustee for Lisa Beth
Nissenbaum Trust,

Defendants.

Adv. Pro No. 10-04878 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT OF DEFENDANTS'
MOTION TO WITHDRAW THE REFERENCE**

HELEN DAVIS CHAITMAN hereby declares, under penalty of perjury pursuant to 28

U.S.C. § 1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am a member of Chaitman LLP, counsel for Defendants, Lisa Beth Nissenbaum Trust and Neal Kurn, in his capacity as Trustee for the Lisa Beth Nissenbaum Trust, (“Defendants”).

2. I submit this Declaration in support of Defendants’ motion to withdraw the reference pursuant to 28 U.S.C. § 157(d) and Rule 5011 of the Federal Rules of Bankruptcy Procedure.

3. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by the Trustee, dated December 2, 2010.

4. Attached hereto as **Exhibit B** is a true and accurate copy of Defendants’ Answer and Affirmative Defenses, dated May 18, 2011.

Dated: New York, New York
April 17, 2020

/s/ Helen Davis Chaitman
Helen Davis Chaitman